



Association of College & University Telecommunications Administrators

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January 9, 1995

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Mr. William Caton
Office of the Secretary
Federal Communications Commission
1919 M Street Northwest, Room #222
Washington, D.C. 20554

RE: Revision of the Commission's Rules to Ensure Compatibility
with Enhanced 911 Emergency Calling Systems

Dear Mr. Caton:

Enclosed for filing are the comments of the Association of College and
University Telecommunications Administrators, Inc. (ACUTA) on CC Docket
No. 94-102, Notice of Proposed Rule Making in the matter of revision of the
Commission's rules to ensure compatibility with enhanced 911 calling
systems.

We have enclosed an original and ten copies of our comments. Please
file mark a copy and return it to me in the enclosed envelope.

Thank you for your consideration of ACUTA's comments in this matter.

Sincerely,

Randal R. Collett
President, ACUTA
152 West Zandale Drive, Suite 200
Lexington, KY 40503-2486

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JAN 17 1995

Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FCC MAIL ROOM

IN THE MATTER OF

Revision of the Commission's Rules to Ensure
Compatibility with Enhanced 911 Emergency
Calling Systems

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CC Docket No. 94-102
RM-8143

COMMENTS OF
THE ASSOCIATION OF COLLEGE AND UNIVERSITY
TELECOMMUNICATIONS ADMINISTRATORS, INC. (ACUTA)

I. INTRODUCTION

1. The Association of College and University Telecommunications Administrators, Inc. (ACUTA) is a non-profit organization with over 700 public and private college and university members, including most of the nation's large public universities. As a leading voice in higher education telecommunications, ACUTA represents over one-third of the non-profit institutions of higher learning in this country.

II. MEMBERSHIP SURVEY

1. According to a recent ACUTA membership survey where members were asked to respond to a number of questions relative to the subject NPR, they generally support the intent of the Commission's proposed rules to ensure compatibility of PBXs and wireless services with enhanced 911 calling systems. However, it is felt that implementation of the proposed rules has the potential to be costly and to disrupt established emergency response operations already in existence on many campuses. The survey responses from a total of 118 institutions representing both the public and private sectors are summarized below.

	YES	NO
a. Do you favor a nationwide standard for PBX-E911 compatibility.	69%	31%
b. Do you believe the FCC rules should pre-empt state and local compatibility requirements.	47%	53%
c. Do you agree that the FCC rules should assign or limit liability for the transmission of E-911 information.	83%	17%

d. Do you believe that ANI and ALI information should be passed to the PSAP by both wireless and PBX/CENTREX type services. 56% 44%

III. PBX/CENTREX COMPATIBILITY STANDARDS

1. It is clear from the results of the survey that the ACUTA membership favors the adoption of a nation-wide standard for PBX-E911 compatibility by over a margin of 2:1. At the same time, there are many ACUTA member institutions which are currently providing Public Service Answering Point (PSAP) services for their campus, and in some cases for their community. Others rely upon a municipal PSAP to forward ANI and ALI information obtained from their local exchange carrier (LEC). At institutions that have their own recognized Public Safety or Police department, and who currently provide E-911 services to their campus and/or community, the existing PBX/CENTREX systems may not meet the current or proposed E-911 operational and/or technical standards. ACUTA believes that the 911 or E-911 systems in use at these institutions should be grandfathered. In the alternative, they could be accommodated by a waiver of compliance in the proposed rule changes.

IV. STANDARD PROTOCOL SUPPORTED

1. A corollary to the adoption of a nation-wide standard for E-911 compatibility, is the acceptance of a set of national standard protocols for the transmission of both the ANI and ALI information to PSAPs. Whether the adoption of the NENA standard, as proposed by Bell Atlantic and GE, is the most appropriate format is a question that must be addressed from a software and cost perspective. ACUTA supports the movement in this direction.

V. LIABILITY

1. While the instant proceeding concerns the compatibility of PBX equipment and wireless services with E-911 systems, a parallel concern relates to the future availability of the ALI information for users of CENTREX type services. In the face of continuing technological and regulatory changes that are starting (and will continue) to fragment the "LINK" between the servicing central office and the end station user, the potential exists for the loss of the present sole source LEC responsibility for maintenance of the ALI's underlying data base. ACUTA members are concerned that unless regulatory reforms address this problem, and particularly the attendant liability issues, the full capabilities of E-911 for both existing and future applications, may not be realized.

2. With respect to E-911, the higher education community is in many ways in a unique position. A significant percentage of our member institutions are colleges and universities which are situated on large campuses, many of them extending over several thousand acres. In a number of cases the outside telephone plant at these facilities is institutionally owned and not within the LEC's jurisdiction. Traditionally the LEC E-911 data base's information stream stops at the LEC interface, which in these cases may still be a long way from the telephone instrument. Hence the ALI information may not be available for PSAP use. Generally it is not the lack of this information but rather the liability for its validity that precludes its availability to PSAP operators. It is this lack of information that is of great concern to ACUTA

and its membership.

Liability is one of the more significant issues directly related to the future functioning and viability of the entire E-911 concept. Up to this point in time, liability for the validity of the data base, (and in particular the Automatic Location Information (ALI) portion), has been the LEC's responsibility. It is the ubiquitous and proprietary nature of this network that has been the key to E-911's success.

Technological advances coupled with current and proposed changes in the regulatory arena are creating a new playing field for services providers. As these providers, with a plethora of new facilities and services enter the marketplace, the Public Switched Telephone Net work (PSTN) will not only expand but will become diluted from a liability point of view. With these changes will also come a host of fresh challenges that will need to be addressed in a timely fashion.

With these changes will also come a shrinking of the LEC's present responsibility for maintenance of the underlying E-911 data base, unless steps are taken to reverse this trend. As the interface between the LEC's and their end users moves from the jack in the office toward the service central office, so does the information in their data base. This is happening, not because of a lack of such information, but rather as the only means at their disposal to limit their liability to that portion of the PSTN over which they retain full control and responsibility.

It is ACUTA's feeling that, in order to prevent the demise of the entire E-911 system and the concept upon which it is based, changes need to be made in the way that E-911 data bases are maintained and how the responsibility and ultimate liability for such maintenance is assigned. The most viable solution on the horizon would appear to be that the local municipality (or whatever organization provides the E-911 service, via an Office of General Services state contract) shoulder at least a significant portion of the responsibility. In order to be effective, it must be Federally mandated. Leaving such decisions to state or local authorities will ultimately lead to patchwork quilt type results.

VI. RECOMMENDATIONS

With respect to the proposed rule changes, ACUTA makes the following recommendations:

1. That provisions be included in the instant proceeding to grandfather existing institutionally provided 911 or E-911 systems, even though they may not meet the letter of the proposed technical standards, and in such cases to permit upgrading over an extended period, since the necessary capital expenditures at many institutions must be incorporated into a three to five year budget planning cycle.
2. That this NPR be expanded to address the data base integrity and associated liability issues that were outlined in paragraph V. above.